

**Reply under 37 CFR 1.116
Expedited Procedure
Technology Center 2600**

REMARKS

By this amendment, Applicants have amended claims 21, 23-24, 26-28 and 31-40, canceled claims 29-30, without prejudice, and added new claims 41-42. As a result, claims 21-28 and 31-42 are pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Final Office Action, the Office rejects claims 21, 27-29 and 36-40 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,314,408 (Salas) in view of U.S. Patent No. 6,889,379 (Lindhorst). With respect to claim 21, Applicants respectfully submit that even if, *arguendo*, the combination of Salas and Lindhorst is proper, neither Salas, Lindhorst, nor the combination thereof, discloses, *inter alia*, the claimed providing step. For example, the claimed providing step provides system software that includes a print driver for generating a print file based on a document in response to a print request received from an application. Neither Salas nor Lindhorst discusses or suggests such a print driver. Further, the system software also includes an upload manager that automatically transfers the print file over the network in response to the print request using at least one of the HyperText Transport Protocol (HTTP) or the HyperText Transport Protocol Secure (HTTPS). Again, neither Salas nor Lindhorst discusses or suggests such an upload manager. As a result, Applicants respectfully request withdrawal of the rejection of claim 21 and claim 27, which depends therefrom, as allegedly being unpatentable over Salas in view of Lindhorst.

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With respect to claim 28, Applicants respectfully submit that even if, *arguendo*, the combination of Salas and Lindhorst is proper, neither Salas, Lindhorst, nor the combination thereof, discloses, *inter alia*, the claimed receiving, generating and automatically transferring steps. In the claimed invention, a print request for a document is received from an application, and in response, a print file is generated based on the document and the print file is automatically transferred over a network using at least one of the HyperText Transport Protocol (HTTP) or the HyperText Transport Protocol Secure (HTTPS). Applicants note that neither Salas nor Lindhorst discusses or suggests such steps. As a result, Applicants respectfully request withdrawal of the rejection of claim 28 as allegedly being unpatentable over Salas in view of Lindhorst.

With respect to claim 29, by this response, Applicants have canceled claim 29, without prejudice. As a result, Applicants note that this rejection is moot.

With respect to claim 36, Applicants note that the Office presents arguments substantially similar to those presented with respect to claim 21. To this extent, Applicants hereby incorporate the arguments presented above with respect to claim 21. As a result, Applicants respectfully request withdrawal of the rejection of claim 36 as allegedly being unpatentable over Salas in view of Lindhorst.

With respect to claim 38, Applicants note that the Office presents arguments substantially similar to those presented with respect to claim 28. To this extent, Applicants hereby incorporate the arguments presented above with respect to claim 28. As a result, Applicants respectfully request withdrawal of the rejection of claim 38 as allegedly being unpatentable over Salas in view of Lindhorst.

With respect to claim 39, Applicants note that the Office relies on its arguments presented with respect to claim 21. To this extent, Applicants hereby incorporate the arguments presented

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above with respect to claim 21. As a result, Applicants respectfully request withdrawal of the rejection of claim 39 as allegedly being unpatentable over Salas in view of Lindhorst.

With respect to claim 40, Applicants note that the Office relies on its arguments presented with respect to claim 28. To this extent, Applicants hereby incorporate the arguments presented above with respect to claim 28. As a result, Applicants respectfully request withdrawal of the rejection of claim 40 as allegedly being unpatentable over Salas in view of Lindhorst.

Further, the Office rejects claims 22-26 and 31-35 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Salas in view of Lindhorst and further in view of Tech-Pro TCP/IP Basics, http://www.tcch-pro.net/intro_tcp.html (Tech-Pro). With respect to claims 22-26, Applicants note that the Office relies on its interpretation of Salas and Lindhorst with respect to claim 21, from which these claims depend. To this extent, Applicants hereby incorporate the arguments presented above with respect to claim 21. As a result, Applicants respectfully request withdrawal of the rejection of claims 22-26 as allegedly being unpatentable over Salas in view of Lindhorst and further in view of Tech-Pro.

With respect to claims 31-35, Applicants note that the Office relies on its interpretation of Salas and Lindhorst with respect to claim 28, from which these claims depend. To this extent, Applicants hereby incorporate the arguments presented above with respect to claim 28. As a result, Applicants respectfully request withdrawal of the rejection of claims 31-35 as allegedly being unpatentable over Salas in view of Lindhorst and further in view of Tech-Pro.

Still further, the Office rejects claim 30 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Salas in view of Lindhorst and further in view of U.S. Patent No. 6,600,569 (Osada). By this response Applicants have canceled claim 30, without prejudice. As a result, Applicants note that this rejection is moot.

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Applicants submit that the newly added claims 41 and 42 are patentable as presented. As a result, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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